



engaged in the business of a collection agency. It does business in Illinois. Its registered agent and office is CT Corporation System, 208 S. LaSalle Street, Suite 814, Chicago, IL 60604.

7. Defendant Convergent Outsourcing, Inc., uses the mails and telephone system to collect debts originally owed (if at all) to others.

8. Defendant Convergent Outsourcing, Inc., is a debt collector as defined in the FDCPA.

9. Defendant Palisades Collection, LLC is a limited liability company organized under Delaware law and engaged in the business of a collection agency. It does business in Illinois. Its registered agent and office is CT Corporation System, 208 S. LaSalle Street, Suite 814, Chicago, IL 60604.

10. Defendant Palisades Collection, LLC uses the mails and telephone system to collect debts originally owed (if at all) to others.

11. Defendant Palisades Collection, LLC is a debt collector as defined in the FDCPA.

### **FACTS**

12. On or about January 18, 2012, Convergent, on behalf of Palisades, sent plaintiff the letter attached as Exhibit A, seeking to collect an alleged debt to Verizon Virginia.

13. On January 23, 2012, plaintiff telephoned Convergent, disputed the debt, and requested verification that he owed the alleged debt.

14. Since January 23, 2012, at no time has Convergent ever provided plaintiff with proof that he owes the alleged debt.

15. On October 4, 2012, Palisades sent plaintiff the letter attached as Exhibit B.

16. On October 5, 2012, plaintiff called Palisades and was informed that defendants have been attempting to collect from plaintiff a purported delinquent debt originally owed to Verizon Virginia for landline service provided during 2004.

17. Plaintiff does not owe any such debt. At the time the debt was supposedly incurred, plaintiff was assigned to a ship and did not have a landline. Furthermore, Mr. Jackson is now a Verizon customer and the company does not claim he owes any money from this time period.

18. In addition, a relative of plaintiff received a call from Palisades, seeking to locate plaintiff.

19. Plaintiff has been annoyed and aggravated by defendants' collection activities.

**COUNT I – FDCPA**

20. Plaintiff incorporates paragraphs 1-19.

21. Exhibits A and B falsely asserted that plaintiff owed money, in violation of 15 U.S.C. §§1692e and 1692e(10).

22. 15 U.S.C. §1692e provides:

**§ 1692e. False or misleading representations**

**A debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt. Without limiting the general application of the foregoing, the following conduct is a violation of this section:**

**... (10) The use of any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer.**

WHEREFORE, the Court should enter judgment in favor of plaintiff and against defendant for:

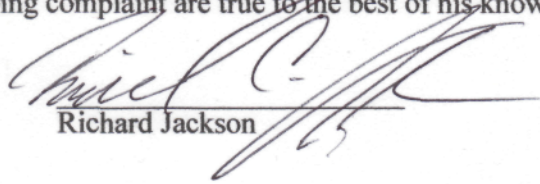
- (1) Statutory and actual damages;
- (2) Attorney's fees, litigation expenses and costs of suit;
- (3) Such other and further relief as the Court deems proper.

s/Daniel A. Edelman  
Daniel A. Edelman

Daniel A. Edelman  
Cathleen M. Combs  
James O. Lattuner  
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**VERIFICATION**

The undersigned declares under penalty of perjury, as provided for by 28 U.S.C. §1746, that the facts stated in the foregoing complaint are true to the best of his knowledge and belief.

  
Richard Jackson

**NOTICE OF LIEN AND ASSIGNMENT**

Please be advised that we claim a lien upon any recovery herein for 1/3 or such amount as a court awards. All rights relating to attorney's fees have been assigned to counsel.

s/Daniel A. Edelman  
Daniel A. Edelman

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